

Brian D. Sullivan
FOX ROTHSCHILD LLP
75 Eisenhower Parkway, Suite 200
Roseland, NJ 07068
Tel: (973) 994-7525
Email: bsullivan@foxrothschild.com
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BLUE SKY 1, LLC,

Plaintiff,

v.

JAGUAR LAND ROVER NORTH
AMERICA, LLC,

Defendant.

Case No. 2:16-cv-00207-ES-JAD

Motion Day: March 7, 2016

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Complaint herein, the accompanying declaration of Lee Maas, dated February 1, 2016, and the exhibits thereto, and the accompanying Defendant's Brief in Support of Motion to Dismiss, dated February 1, 2016, defendant Jaguar Land Rover North America, LLC, shall move this Court, before the Honorable Esther Salas, United States District Judge, on March 7, 2016, or as soon thereafter as the Court permits, for an order pursuant

to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint with prejudice for failure to state a claim upon which relief can be granted.

Dated: Roseland, New Jersey
February 1, 2016

Respectfully submitted,

s/Brian D. Sullivan

Brian D. Sullivan
FOX ROTHSCHILD LLP
75 Eisenhower Parkway, Suite 200
Roseland, NJ 07068
Tel: (973) 994-7525
Email: bsullivan@foxrothschild.com

*Attorneys for Defendant Jaguar
Land Rover North America, LLC*